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Life Insurance—Insurable Interest—Assignments.—The right of a person to procure insurance on his own life and assign the policy to another who has no insurable interest in the life insured is sustained in *Rylander v. Allen* (Ga.), 6 L. R. A. (N. S.) 128, provided it be not done by way of cover for a wager policy.

Criminal Prosecution of Standard Oil Co.—The prosecution of the Standard Oil Co. for violation of the Elkins Act has resulted so far in the overruling by the United States District Court for the Northern District of Illinois of the demurrers interposed by the defendant, inasmuch as the new rate law expressly repeals all laws in conflict with its provisions with the proviso that it shall not affect cases now pending in the courts of the United States. The Oil Company sought to escape prosecution for penalties incurred under the Elkins Law. Indictments were found subsequent to the enactment and approval of the new rate law. The revised Statutes provide that the repeal of any statute shall not have the effect to release any penalty, forfeiture or liability incurred under such statute unless the repealing act expressly so provides. Judge Landis holds that the repeal of parts of the Elkins Law conflicting with the new rate law did not extinguish penalties previously incurred under the former law. The contention that the section of the Revised Statutes referred to above was an unwarranted interference with the authority of succeeding congresses is dismissed by the court, as is also the contention that the saving clause of the rate bill refers only to causes now pending.

Definition of "Travelers."—The Supreme Court of Vermont, in *Howrigan v. Bakersfield*, 64 Atlantic Reporter, 1130, is called upon to pass upon the novel question as to whether a horse traveling on a highway can be held to be a traveler within the statute making towns liable for injuries to travelers. The court says that if the horse escaped into the highway without the owner's fault or negligence he cannot be considered as being at large in a legal sense, and that if he were following his natural instinct to return home he was a traveler on the highway.

Powers of Religious Societies.—The Supreme Court of Iowa has also recently passed upon religious societies. The case of *State v. Amana Society*, 109 Northwestern Reporter, 894, goes into the right of this association to engage in agricultural pursuits and in business and manufacturing enterprises. The state contended that the society was maintained for purely secular purposes, and contended that religion pertains to the spiritual belief and welfare of man as distinguished from his physical wants and necessities; that it relates to the ethics of life and to the hope and belief in immortality. The court concedes the correctness and theory of these contentions, but points out that practical religion may not be so completely separated from